

ESTTA Tracking number: **ESTTA735733**

Filing date: **03/24/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221170
Party	Defendant RSM Consulting
Correspondence Address	ROBERT L SHERMAN PAUL HASTINGS LLP 75 E 55TH STREET NEW YORK, NY 10022 UNITED STATES rls@paulhastings.com
Submission	Motion to Extend
Filer's Name	Natalie G. Furman
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Signature	/Natalie G. Furman/
Date	03/24/2016
Attachments	RSM GLOBAL - Motion.pdf(208347 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the Matter of Application Serial No. 86/273,073
Published in the Official Gazette on October 21, 2014
Mark: RSM GLOBAL (stylized/design)

RSM International Association,

Opposer,

v.

RSM Consulting,

Applicant.

Opposition No. 91221170

**MOTION FOR AN EXTENSION OF THE ANSWER AND THE DISCOVERY AND
TRIAL PERIODS**

Applicant's Time to Answer is currently set to close on March 24, 2016. RSM Consulting requests that such date be extended for thirty (30) days, or until April 23, 2016, and that all subsequent dates be reset accordingly.

The parties have engaged in settlement discussions and are reviewing written proposed settlement terms. The parties have previously filed motions on consent to extend to permit continued settlement discussions, with the understanding that settlement would obviate the need for further proceedings in this matter.

Based on the parties' past consent motions to extend and the parties' mutually expressed interest in reaching a settlement, RSM Consulting has a good faith belief that Opposer would consent to extend the proceedings. However, RSM Consulting has been unable to obtain express consent of Opposer prior to filing this motion due to incompatible schedules and the inability of

RSM Consulting to reach Opposer via email, and accordingly is filing this as a motion without consent.

This motion is made in good faith, without any intent to cause delay or prejudice, and with the sole purpose of allowing the parties time to finalize and execute the settlement agreement.

Accordingly, RSM Consulting respectfully requests that the Board grant its Motion on Consent for an Extension of the Answer and the Discovery and Trial Periods and adopt the following schedule:

Time to Answer :	04/23/2016
Deadline for Discovery Conference :	05/23/2016
Discovery Opens :	05/23/2016
Initial Disclosures Due :	06/22/2016
Expert Disclosures Due :	10/20/2016
Discovery Period to Close :	11/19/2016
Plaintiff Pretrial Disclosures :	01/03/2017
Plaintiff's 30-day Trial Period Ends :	02/17/2017
Defendant's Pretrial Disclosures :	03/04/2017
Defendant's 30-day Trial Period Ends :	04/18/2017
Plaintiff's Rebuttal Disclosures :	05/03/2017
Plaintiff's 15-day Rebuttal Period Ends :	06/02/2017

Dated: March 24, 2016

Respectfully submitted,

PAUL HASTINGS LLP

By:



Natalie G. Furman

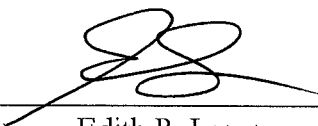
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Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2016, a true and complete copy of the foregoing
**MOTION FOR AN EXTENSION OF THE ANSWER AND THE DISCOVERY AND
TRIAL PERIODS** has been served on Michael H. Selter by mailing said copy, via First Class Mail
to:

Michael H. Selter, Esq.
Manelli Selter PLLC
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Edith R. Lopez